REMARKS/ARGUMENTS

Applicants respond herein to the Office Action of December 13, 2007.

Claims 1-14 are pending in the Application. Claims 7-9, 13 and 14 were withdrawn from consideration. Claims 1-6 and 10-12 were rejected in the Office Action. Applicants amended Claims 1, 4-5 and 10 and respectfully request reconsideration of the rejection.

Claims 1-6 and 10-12 were rejected in the Office Action under 35 U.S.C. 102(e) as being anticipated by Comaniciu et al. (U.S. Patent No. 6,590,999).
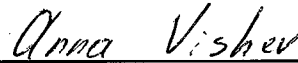
Claims 1 and 10, as amended, recite a system and method, respectively, for monitoring and displaying relative positions of competing moving objects, where a unique identifier 16 placed onto each competing moving object. Identifier 16 uniquely identifies each competing moving object at any moment of time. Further, as described in paragraph [0017] of the Application, identifier detector 10 detects relative positions of the unique identifiers with respect to each other. In other words, detector 10 does not identify an absolute position (i.e., coordinates) of any particular competing moving object identifier. Detector 10 then conveys the detected relative positions of the unique identifiers to a processor 12, which determines relative positions of the competing moving objects based on the conveyed relative positions of the unique identifiers.

Contrary to the recitations of Claims 1 and 10, Comaniciu teaches a method and apparatus for determining absolute positions of moving targets. Specifically, Comaniciu states: "A degree of similarity ($\rho(y_0)$) is computed between a given target (at y_0) in a first frame and a candidate target (at y_1) in a successive frame, the degree being expressed by a metric derived from the Bhattacharyya coefficient. A gradient vector corresponding to a maximization of the Bhattacharyya coefficient is used to derive the most probable location of the candidate target in the successive frame." See, Comaniciu, Abstract. Therefore, Comaniciu teaches away from the invention recited in the amended Claims 1 and 10 of the present Application. Accordingly, Claims 1 and 10 are allowable over the cited prior art.

Claims 2-6 and 11-12 depend from Claims 1 and 10, respectively. Therefore, Claims 2-6 and 11-12 are allowable at least for the same reasons as Claims 1 and 10 and, further, on their own merits. Favorable reconsideration of the rejection and allowance of Claims 1-6 and 10-12 is respectfully requested.

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TRADEMARK OFFICE EFS FILING
SYSTEM ON June 13, 2008.

Respectfully submitted,

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